

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

JO-NATHAN LUTON)	CASE NO. 1:19CV00468
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
vs.)	<u>VOLUNTARY DISCLOSURE OF</u>
)	<u>DEFENDANTS STEVENS AND</u>
CITY OF CLEVELAND, <i>et al.</i> ,)	<u>TYLKA</u>
)	
Defendants.)	

Now come the Defendants, Joseph Tylka and Lewis Stevens, by and through counsel, and pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, disclose the following:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of information:
 - a. Plaintiff has knowledge of his claims against Defendant.
 - b. Joseph Tylka has knowledge of his involvement in the subject incident.
 - c. Lewis Stevens has knowledge of his involvement in the subject incident.
 - d. Steven Fedorko has knowledge of his involvement in the subject incident.

e. Michael Boyd has knowledge of his involvement in the subject incident.

f. Those individuals identified by Plaintiff and the co-defendants.

2. A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings:

None in the possession of this Defendant.

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

Not applicable.

4. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

None.

Respectfully submitted,

/s/ Kathryn M. Miley

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Attorneys for Defendants Stevens and

Tylka

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2019, a copy of the foregoing was served on the parties through the court's electronic filing system.

/s/ Kathryn M. Miley

Ernest L. Wilkerson, Jr.

Kathryn M. Miley

City/Luton/voluntary disclosure